

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA

MIAMI DIVISION

CASE NO: 22-TP-20009-KMM

UNITED STATES OF AMERICA,

Plaintiff,

vs.

FELIPE MARQUEZ,

Defendant.

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MOTION FOR EARLY TERMINATION OF PROBATION

NOW COMES the Defendant, FELIPE MARQUEZ, by and through his undersigned attorney and files this his Motion for Early Termination of Probation and would state:

1. The above Defendant entered a plea in the United States District Court for the District of Columbia under Case Number: 21-CR-00136-RC-1, and was sentenced on December 10, 2021 to a term of eighteen (18) months of probation.
2. On February 28, 2022, the jurisdiction and supervision of the Defendant was transferred to the Southern District of Florida and the matter was assigned Case Number: 22-TP-20009-KMM.
3. The Defendant has now successfully completed two thirds of his term of probation without incident nor any alleged violations.
4. Undersigned counsel has contacted Assistant United States Attorney Jeffrey Nestler who prosecuted this matter in Washington, D.C. in order to determine his position on the relief requested herein. He has informed undersigned counsel that he objects to the relief requested.

5. Undersigned counsel has contacted Probation Officer Samantha Reid who is supervising the Defendant in the Southern District of Florida in order to determine her position on the relief requested herein. As of this writing, no response has been received.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed electronically with the Clerk of the Court this 16th day of December, 2022 via the e-filing portal.

Respectfully submitted,

BARRY E. WITLIN, P.A.

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